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Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

) CASE NO.: 2:23-cv-6302-HDV-AJR
)
) **DECLARATION OF MARK SNOOKAL**
) **IN SUPPORT OF PLAINTIFF'S MOTION**
) **FOR ATTORNEYS' FEES**
)
) *[Filed concurrently herewith Plaintiff Mark*
) *Snookal's Notice of Motion and Motion for*
) *Attorneys' Fees and Costs; Tables 1 and 2 to*
) *Plaintiff's Motion for Attorneys' Fees and*
) *Costs; Declarations of Dolores Y. Leal, Olivia*
) *Flechsig, Renee Mochkatel, Karis Stephen,*
) *Sabria Medler, J. Bernard Alexander, III, Lisa*
) *Bloom, and Tamara Freeze; and [Proposed]*
) *Order Granting Plaintiff's Motion for*
) *Attorneys' Fees and Costs]*
)
) Action Filed: August 3, 2023
) Trial Dates: August 19-25, 2025
) Judgment Entered: September 3, 2025
)
) Date: November 13, 2025
) Time: 10:00 a.m.
) Crtrm: 5B
)
)
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DECLARATION OF PLAINTIFF MARK SNOOKAL

I, MARK SNOOKAL, declare as follows:

1. I am the Plaintiff in the above-captioned matter and am personally familiar with the facts of this case. If called as a witness, I could and would competently testify to the following facts based upon my own personal knowledge.

2. This declaration is being filed in support of Plaintiff Mark Snookal's Motion for Attorneys Fees and Costs pursuant to Government Code § 12965(b).

3. Throughout the litigation process, through trial, and to the present, Allred, Maroko & Goldberg has represented me in this matter.

4. Prior to when I contacted Allred, Maroko & Goldberg and they then agreed to represent me, I had to search extensively for legal representation to pursue my employment claims against Defendant Chevron USA, Inc.

5. During my search efforts, I submitted information about my employment legal claims to a handful of different plaintiff-side employment law firms which never let me past their initial screening process.

6. In addition, there were approximately seven or eight lawyers I spoke with while I was seeking representation who declined to represent me. When some of these lawyers explained their decision to decline to represent me, the reasoning was, in essence, that the case would take too long, the case would be too complex, and/or they were concerned that Chevron USA, Inc. would refuse to ever settle because of their size and resources.

8. Before retaining Allred, Maroko & Goldberg to litigate my case, I filed a charge of discrimination with the California Department of Fair Employment and Housing ("DFEH") (now the California Civil Rights Department). The DFEH mediated my case some time in or about 2022, but the case did not settle. Ultimately, the DFEH then informed me that they were declining to pursue the case further, citing "agency discretion." They then issued me a Right to Sue Notice.

1 I declare under penalty of perjury under the laws of the State of California
2 that the foregoing is true and correct.

3 Executed this 16 day of September 2025, in Vancouver, State of Washington.
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Mark Snookal (Sep 16, 2025 12:32:36 PDT)

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